

Jesse Merrithew, OSB No. 074564

Email: jesse@lmhlegal.com

Viktoria Safarian, OSB No. 175487

Email: viktoria@lmhlegal.com

Levi Merrithew Horst PC

610 SW Alder Street, Suite 415

Portland, Oregon 97205

Telephone: (971) 229-1241

Juan C. Chavez, OSB No. 136428

Email: jchavez@ojrc.info

Brittney Plessner, OSB No. 154030

Email: bplessner@ojrc.info

Alex Meggitt, OSB No. 174131

Email: ameggitt@ojrc.info

Franz H. Bruggemeier, OSB No. 163533

Email: fbruggemeier@ojrc.info

Oregon Justice Resource Center

PO Box 5248

Portland, OR 97208

Telephone: 503 944-2270

J. Ashlee Albies, OSB No. 051846

Email: ashlee@albiesstark.com

Whitney B. Stark, OSB No. 090350

Email: whitney@albiesstark.com

Maya Rinta, OSB No. 195058

Email: maya@albiesstark.com

Albies & Stark LLC

1 SW Columbia St. Suite 1850

Portland, Oregon 97204

Telephone: (503) 308-4770

Facsimile: (503) 427-9292

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, et al.

Plaintiffs

v.

CITY OF PORTLAND, a municipal corporation,

Defendant.

Case No.

DECLARATION IN SUPPORT OF PETITION
FOR TEMPORARY RESTRAINING ORDER

I, Mara Kruszewski, declare as follows pursuant to 28 USC § 1746:

1. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. I have lived in Portland for approximately three years.
3. On Sunday, March 31, 2020, I went to a protest at approximately 5-6pm to march because I believe that Black lives matter, I believe that George Floyd deserves justice, Breonna Taylor deserves justice, Tony McDade, and all other Black people who have been killed through police violence.
4. We marched from Laurelhurst Park all the way down to the Justice Center (Multnomah County Detention Center) downtown. I was with my partner and two friends; we had other friends that we would meet up with on and off.
5. I wear contacts. I had been instructed to take them out by fellow protestors because if they administered tear gas, my contacts would melt in my eyes and I may become blind. After taking them out, I could not see far away faces or read street signs; everything was a little blurry, but I could still make out shapes and identify what was going on.
6. The crowd around us was chanting, and we were chanting along.
7. I did not throw anything or engage in any property destruction. I did not see any people in the crowd attacking people or being violent towards other human beings. As the marching ended, I situated myself behind a few lines of people in front of the police, diagonal from the corner of SW 3rd & Main Street in downtown Portland.
8. Around 11:30pm-12:00am, I heard the police say over the speaker something like: "This is the Portland Police. We have determined this protest unlawful. Move your protest West to the park or you will be subject to force if you do not leave." My friends and I had no idea why this protest was unlawful, why we had to move. The police said that ambulances were

trying to come through, but we did not see or hear any ambulances throughout the duration of the night. I saw a medic make their way through the crowd as people moved aside so that the medic could attend to an apparent medical emergency diagonal from us on SW 3rd & Main Street.

9. Close to 3rd & Main Street I saw a small firework towards the Justice Center, but it was a good distance from where the police were. Suddenly, tear gas and flash bangs were falling all around us. I could not count how many. One tear gas canister fell right next to my partner. My friends and I linked arms and tried to get away (towards the statue of the moose/deer facing the Justice Center). I saw more tear gas canisters being thrown into the park where we were heading and protestors were trying to leave towards, so we could not escape it.
10. My eyes burned, my lungs burned, my nose burned, and snot was pouring uncontrollably onto my face mask. I was already visually impaired without contacts or glasses, and my partner was trying to lead me out running and dragging me to safety while they were coughing uncontrollably, I was yelling "I can't see! stop I can't see where I'm going!" I was freaking out because I was in so much pain and thought I was going to trip and run into people. People were running around everywhere and yelling, and everyone seemed so afraid. Four people in the crowd saw my distress and attempted to pour milk into my eyes and wash it out, but it wasn't working and I couldn't open my eyes. I came across another stranger in the crowd who had baking soda and water that they poured into my eyes, which helped. My partner has asthma and didn't have their inhaler and after getting neutralized with the baking soda and water as well, they were able to see better but were having trouble breathing.
11. We had to walk back to my car near Laurelhurst Park, at least 3 miles away. My partner did


not have their inhaler and still could not breathe the whole walk back. I was so afraid that my partner would have a lethal asthma attack and we would have no way to help them. We were terrified on the whole way that we would be arrested but we don't know what we did wrong.

12. I cried so much because of the fear the next day and the day after. I could not believe the force I saw coming from the police. I could not understand why they kept throwing tear gas in the direction that they told us to retreat too.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 5, 2020.

DocuSigned by:



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Mara Kruszewski